

REMARKS/ARGUMENTS

Claims 1-41 remain in the application. Claims 18-32 and 37-39 are withdrawn following a restriction requirement.

A. Restriction/Election.

The election of claims 1-17, 33-36 and 40-41 without traverse is confirmed.

B. Rejections under 35 U.S.C. 102.

Claims 1-17, 33-36 and 40-41 were rejected under 35 U.S.C. 102 based upon Shaffer et al. This rejection is respectfully traversed.

Claim 1 calls for, among other things, transaction data related to a channel participant, a candidate identification mechanism for accessing candidate reference records using spatial and business data, and a spatial matching mechanism for matching a subset of the candidate records to the transaction data. These features of claim 1 are not shown or suggested in the Shaffer et al. reference.

The term "transaction data" in claim 1 refers to data related to a transaction. While the term can and should be interpreted broadly, "transaction data" must be fairly construed to mean data that has something to do with a transaction. Merriam Webster Online Dictionary provides a suitable definition of the plain meaning of "transaction" as

1a: something transacted; especially: an exchange or transfer of goods, services, or funds

This definition is consistent with the usage of that term in the specification and claims of the instant invention. Shaffer et al. do not discuss any data that is related to a transaction. Instead, Shaffer et al. are concerned with linking various data sources using a linkage key. The linkage key is provided explicitly by a customer or derived from information provided by a customer, and does not come from a transaction nor is it related to a transaction.

Office action does not even allege that Shaffer et al. show a candidate identification mechanism. Hence, the Office action fails to state a *prima facie* case of obviousness. For this reason alone the rejection should be withdrawn. Moreover, even if the Office action had stated a proper rejection, Shaffer et al. do not show or

suggest a candidate identification mechanism. Shaffer et al. do not entertain the concept of "candidate" records. Shaffer et al. assume that there is no ambiguity in the data—a particular linkage key will unambiguously point to the specific database records. In contrast, the invention of claim 1 recognizes that in real-world situations transaction data is often ambiguous. This ambiguity is particularly prevalent in the case of location information such as street addresses, as well as names of people and businesses that appear in transaction data. This type of transaction data often contains errors, omissions, abbreviations, and the like that prevent that data from behaving like the theoretically precise linkage key used by Shaffer et al.

Hence, while Shaffer et al. suggest their linkage key will unambiguously identify a record in a database, the invention of claim 1 allows for identification of one or more candidate records. The spatial matching mechanism is then used to match a subset of the candidate records (e.g., one candidate record) to the transaction data. Shaffer et al. do not need to use spatial matching mechanism for this purpose.

For at least these reasons claim 1 is not shown or suggested by the Shaffer et al. reference. Claims 2-17 that depend from claim 1 are allowable for at least the same reasons as claim 1 as well as the individual limitations presented in those dependent claims. It is particularly noted that Shaffer et al. do not show or suggest lexical matching as called for in claim 13. The cited portions of Shaffer et al. have nothing to do with lexical matching. Also, the cited portions of Shaffer do not show or suggest any selection process as called for in claims 16-17. It is respectfully requested that the rejection of claims 1-17 be withdrawn.

The Office action rejects claims 33-34 for the same grounds as claim 1. However, claims 33-34 include limitations that do not appear in claim 1. Hence, the Office action fails to state a *prima facie* case of anticipation. For this reason alone the rejection of claims 33-34 should be withdrawn.

Moreover, independent claim 33 calls for generating a transaction record comprising data that imprecisely identifies a channel participant. Shaffer et al. do not discuss transaction records, nor does the reference describe the precision or imprecision of a transaction record. For at least these reasons claims 33 and 34-36 that depend from claim 33 are allowable over the relied on reference.

With respect to claims 40 and 41, no rejection is stated against these dependent claims. Accordingly, claims 40 and 41 are allowable not only for the reasons stated in reference to claim 1, but also because the office action fails to state a *prima facie* case of obviousness of these claims.

C. Conclusion.

The references that were cited but not relied upon are no more relevant than the references that were relied upon. In view of all of the above, the claims are now believed to be allowable and the case in condition for allowance which action is respectfully requested. Should the Examiner be of the opinion that a telephone conference would expedite the prosecution of this case, the Examiner is requested to contact Applicants' attorney at the telephone number listed below.

Any fee deficiency associated with this submittal may be charged to Deposit Account No. 50-1123.

Respectfully submitted,

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